

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:

Michael Allen Longshore
Sandra Kay Longshore
Debtors

Case No.: 14-61528
JUDGE Russ Kendig
Chapter 13

MOTION TO INCUR DEBT

Now come debtors, Michael and Sandra Longshore, by and through their attorney, and move the Court for an Order allowing them to incur debt as follows. Debtors are desirous of obtaining a Direct PLUS student loan for their daughter, Shannon C. Longshore. The payments due on said student loan will not be due and payable until after debtors have completed their chapter 13 plan payments. (Please see attached Master Promissory Note).

WHEREFORE, debtors ask the court for permission to sign a promissory note for a Direct PLUS student loan as outlined in the promissory note.

Respectfully Submitted:

/s/ William C. Fithian, III
William C. Fithian, III
Attorney for debtors
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Supreme Court #0012689

PROOF OF SERVICE

I do hereby certify that on July 31, 2017, a copy of the foregoing was electronically transmitted via the Court's CM/ECF system to the following who are listed on the Court's electronic mail notice list: Fifth Third Bank; Stonegate Mortgage; United States Trustee, 201 Superior Avenue E, Ste 441, Cleveland OH 44114-2301; Toby Rosen, Chapter 13 Trustee, Charter One Bank Building, 400 W. Tuscarawas St., Fourth Floor, Canton, OH 44702 .

/s/ William C. Fithian, III
William C. Fithian, III
Attorney for debtors